

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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In re:

Corey Daniels

Debtor.

Chapter 13  
16-22146-gmh

**Objection to Motion to Continue  
Stay Due: April 6, 2016**

**Hearing on Timely-Filed  
Objections: April 12, 2016, at 2:30  
p.m.**

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**MOTION TO CONTINUE AUTOMATIC STAY  
PURSUANT TO 11 USC § 362(c)(3)**

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NOW COMES Deborah A. Stencel of Miller and Miller Law, LLC, attorneys for the Debtor, to move this Honorable Court for entry of an Order Continuing the Automatic Stay pursuant to 11 USC § 362(c)(3), and in support thereof, states as follows:

1. Debtor filed the above-captioned Chapter 13 Bankruptcy on **March 14, 2016**.
2. Debtor had one (1) bankruptcy case pending within the twelve months preceding the filing of this case.
3. Debtor's prior bankruptcy case (**15-26507**) was filed, pursuant to Chapter 13, Title 11 of the United States Bankruptcy Code on **June 3, 2015**, in the Eastern District of Wisconsin, Milwaukee, Wisconsin, and was dismissed **January 26, 2016**.
4. The previous case was dismissed on Trustee's motion for failure to make payments.
5. Debtor's income was reported as follows:

Net Consulting	\$2808.00
Coaching	\$200.00

Boarder	\$300.00
Total (Net) Income	\$3,308.00

6. In this case, his net income is reported as follows:

Projected Net Consulting	\$2969.00
Caregiver income (for caring for his father)	\$100.00
Partner's net cash contribution to mortgage and utilities	\$600.00
Projected Net Speaking/Spiritual Guidance	\$417.00
Total Net Income	\$4,086.00

7. Debtor has expanded his consulting business and motivational work yielding a higher income. The caregiver income is a new endeavor. The partner is the boarder from the previous case. Partner pays half mortgage and utilities but provides for his own separate expenses for other expenses. Mr. Daniels considers his household to be five people: Mr. Daniels and his 4 daughters. The partner is a roommate with a separate financial life.
8. In the last case, there were erroneous claims filed for Child Support and the DWD. Mr. Daniels has resolved the Child Support claim and is still working on the DWD claim.
9. Mr. Daniels' household size has increased slightly – he has care and custody of a friend's toddler son about 50% of the time as the mother cannot do it on her own. He receives no compensation.

10. These changes taken together mean that Debtor is in a more favorable financial position than he was when the last case was filed or during its pendency.
11. These positive changes to his circumstances (greater income, more family support, means, resolution of two large claims) mean that the Debtor has filed the current case with the good faith belief that with these changes he will be able to make Plan payments as required.
12. Debtor's affidavit in support of this motion is attached or will be filed shortly.

Wherefore, Debtor respectfully asks that this Court will enter an order continuing the automatic stay to each creditor.

Respectfully submitted,

/s/ Deborah A. Stencel

Deborah A. Stencel, 1084167  
**Miller and Miller Law, LLC**  
Attorneys for Debtor  
735 W Wisconsin Ave, Ste 600  
Milwaukee, WI 53202-4299  
414.277.7742, 414.277.1303(fax)  
[deborah@millermillerlaw.com](mailto:deborah@millermillerlaw.com)

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**NOTICE OF MOTION TO EXTEND AUTOMATIC STAY**

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To all creditors and parties in interest:

The Debtor, by the undersigned attorney, in the above-captioned case have filed a Motion to Extend the Automatic Stay. A copy of the motion is attached.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

**If you do not want the court to grant the relief sought in the motion, then on or before the objection date stated above, you or your attorney must file a written objection and it must be received by November 5, 2015, at:**

*Clerk, United States Bankruptcy Court  
517 E. Wisconsin Avenue, Room 126  
Milwaukee, WI 53202-4581*

*You must also mail a copy to:*

1. US Trustee, 517 E. Wisconsin Ave, Milwaukee, Wisconsin 53202;
2. Mary B. Grossman, P.O. Box 510920, Milwaukee, Wisconsin 54903;
3. Deborah A Stencel, 735 W Wisconsin Ave, Ste 600, Milwaukee, WI 53233-2413.

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting relief.

**The Court will hold a hearing on any timely-filed objection.** The hearing will take place before **Judge Halfenger**, United States Bankruptcy Judge, in the United States Courthouse at 517 E Wisconsin Avenue, Milwaukee, Wisconsin, in Room **133** at the hearing date and time above. The debtor and the objecting party and/or their counsel must attend the hearing.

The Court will also hold a hearing if the debtor fails to file a supporting affidavit or declaration that complies with 11 U.S.C. Sec. 362(c)(3)(B). The hearing will take place at the same time and place stated above, and the debtor and debtor's counsel must attend this hearing, or the Court will not grant the motion. If the debtor files such an affidavit, but the Court determines that it is insufficient to comply with Sec. 362(c)(3)(B), the Court will notify counsel for the Debtor.

March 22, 2016

/s/ Deborah A. Stencel  
Deborah A. Stencel, 1084167  
Miller & Miller, LLC  
735 W Wisconsin Ave, Ste 600  
Milwaukee, WI 53202-4299  
414.277.7742, 414.277.1313(fax);  
[deborah@millermiller.com](mailto:deborah@millermiller.com)